

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
4 MORRISON & FOERSTER LLP
25 Market Street
5 San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

6 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
7 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
8 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington DC 20005
9 Tel: 202.237.2727 / Fax: 202.237.6131

10 WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
11 SHAWN RABIN (*Pro Hac Vice*)
srabin@SusmanGodfrey.com
12 SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
13 New York, NY 10019-6023
14 Tel: 212.336.8330 / Fax: 212.336.8340

15 Attorneys for Defendants
16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DECLARATION OF ADAM BENTLEY
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO WAYMO'S MOTION
TO COMPEL STROZ-RELATED
DISCOVERY**

22 v.

23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
24 LLC,

25 Defendants.

Trial Date: December 4, 2017

1 I, Adam Bentley, declare as follows:

2 1. I am a member of the bar of the State of California and am in-house counsel at
3 Uber Technologies, Inc. (“Uber”). I submit this declaration in support of Defendants’ Opposition
4 to Motion to Compel Stroz-Related Discovery. I have personal knowledge of the facts stated
5 herein and, if called as a witness, I could and would testify competently as to these facts.

6 2. From May 2014 to April 2016, I was counsel at the law firm O’Melveny & Myers
7 LLP (“OMM”).

8 3. In January 2016, I began working on a matter in which OMM was hired by
9 Ottomotto LLC (“Ottomotto”) and Otto Trucking LLC (“Otto Trucking”) (collectively referred to
10 as “Otto”), to provide legal advice regarding a potential acquisition of Otto by Uber.

11 4. OMM attorneys who primarily advised on this engagement included Paul Sieben,
12 Eric Amdursky, and myself.

13 5. In late April 2016, I left OMM and became in-house counsel at Ottomotto.

14 6. In August 2016 I received the final report (without attachments) prepared by Stroz
15 Friedberg LLC (the “Stroz Report”) in my capacity as in-house counsel for Ottomotto. I never
16 received any drafts of the Stroz Report on behalf of Ottomotto. I am unaware that anyone at
17 Ottomotto or OMM received any drafts of the Stroz Report. I was the point person in-house at
18 Ottomotto for the receipt of any such Stroz related communications.

19 I declare until penalty of perjury that the foregoing is true and correct. Executed this 17th
20 day of October, 2017, in San Francisco, California.

21 _____
22 */s/Adam Bentley*
23 Adam Bentley

24 **ATTESTATION OF E-FILED SIGNATURE**

25 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
26 Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Adam Bentley has
27 concurred in this filing.

1
2 Dated: October 17, 2017
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Arturo J. González
Arturo J. González